

SITE:

Jard

BREAK:

2.2

OTHER:

563942

RCRA INSPECTION REPORT

SDMS DocID

563942

I. GENERAL INFORMATION:

Facility Name: File: G-02-02-004
Jard Company Incorporated
Bowen Road
Bennington, VT 05201
(802) 442-3173

Company Officials Interviewed:

Manny Segura - Bank Trustee for Jard

EPA/State Officials Conducting the Inspection:

Kenneth Rota, VT DEC

Type of Inspection: Initial

Date of Inspection: September 20, 1989

Last Inspection Date: January 19, 1987

II. RCRA REPORTING/INFORMATION REQUIREMENTS:

Facility EPA ID Number: VTD048141741

Type of Operation: Capacitor Manufacturer

Notification Date: September 27, 1981

Source Classification: Generator (>1000 kg/month)

III. SOURCE DESCRIPTION:

Jard Company Inc. is a manufacturer of oil-filled capacitors and small control transformers. The company was established in 1969 as a manufacturer of small capacitors (containing approximately 75 lbs of dielectric fluid), small non-fluid transformers (up to 75 KVA) and small motors (using up to 200 watts).

The manufacture of the oil-filled capacitors first involves foil winding. The windings are housed in metal sleeves and are sent to an oil impregnation line. This operation fills the capacitor with non-pcb dielectric fluids (DOP). After the oil impregnation, the capacitors are degreased, tested and painted.

The transformer operation involves winding the units, assembly of each unit, varnishing and testing.

The manufacturing process generates waste Dioctylnonyl-pthalate (DOP), waste hydraulic and lubricating oils, waste paint

and varnish, waste methylene chloride from varnish removal, waste trichloroethylene, waste 1,1,1 trichloroethane and reject capacitors containing DOP.

IV. GENERAL OBSERVATIONS:

I arrived on-site unannounced and observed a vehicle with New York plates parked in front of the office. I knocked on the door and rang the doorbell but was unable to get any response. I stopped at the site in response to a conversation with Scott Meyer of VOSHA and Charles Watson, formerly of Jard. Both these individuals called to inform me that Jard had closed and was currently in Chapter 11 Bankruptcy. Mr. Watson called to tell me that he was now working for Sprague Electric Company of North Adams, Massachusetts. Both men indicated that hazardous wastes were still on-site and Mr. Watson called to further state that he was layed off and that he no longer had responsibility over the hazardous waste issues at the property.

I walked around the property and looked into the office windows for any individuals that might be on-site and I rang all doorbells and tried all doors to see if the building was secure.

Along the side of the building, I observed what appeared to be a concrete tank and around the tank was a grayish sludge that appeared to have been caused by an overflow of the tank. The sludge looked like waste paint that I have observed at the facility. The sludge, however, also had a smell of DOP.

Further down along this side of the building was a fenced in storage area. The area was locked and a "windshield" survey of the enclosure revealed hazardous waste drums in storage. There were 7 fiber drums containing wastes, 15 fifty-five gallon drums and 1 ~thirty gallon drum (marked corrosive). The front side of the enclosure had ~35 fifty-five gallon drums and ~30-40 assorted sized containers up to ten gallons in volume. Containers could be seen with masking tape or other writing indicating the material was dirty or contaminated. The various hazardous materials seen included oil, methyl alcohol, toluene, trichloroethylene, hydrochloric acid, asbestos roof coating, paint enamel, methanol, acetone and plastic remover.

A walk around the back side of the building found two uncovered fiber drums containing zinc dust and one drum that was filling with zinc dust under the dust collector before the shutdown. A two thousand gallon tank was adjacent to the fiber drums and was full. I could not access the liquid and determine the nature of the waste. A hazardous waste label with no writing (perhaps the writing faded) was affixed to the tank. Zinc dust was seen on the ground and around the tank. The tank was above ground on supports with no secondary containment.

The area also had various pipes and concrete boxes that could not be identified as to their purpose or function. Mr. Watson indicated that the process discharges into an on-site

leachfield. Dick Rollins, president of Jard has apparently disputed the existence of the leachfield. The existence of concrete boxes on the back side of the building appears to be a leachfield type arrangement. A manhole marked "sewer" is also located near the back of the building. The building on this side also has piping that emanates from the building to the outside area. It is not clear if anything is discharged through the pipes.

Along the opposite side of the building, parallel to the side with the fenced enclosure is a small caged area. This area was found to have two fifty-five gallon drums containing a "Dimethyl.....". The labels were positioned such that I could not read them.

My outside inspection brought me completely around the building to the front office area. This time, two vehicles with New York license were observed in the parking lot. I peered through the window and observed two men inside the office. I knocked on the door and managed to get their attention.

I indentified myself to the gentleman opening the door and explained that I was at the plant in response to the bankruptcy problems and hearsay concerning waste left on-site. The person identified himself as Manny Segura. Mr. Segura was a former Jard employee that had recently obtained a job with the bank to oversee the bank's interests. The bank apparently owns the equipment at Jard.

Mr. Segura led me to an inside waste storage area. The area was packed tight with 138 fifty-five gallon drums of various hazardous wastes to be shipped out by C.M. Laboratories. I also observed ~21 cubic yards of reject capacitors that were leaking through their cardboard containers. The reject capacitors were not part of the shipment nor were the wastes observed in the tank and the outside storage areas.

The financial situation with Jard is at the reorganization stages within the bankruptcy courts and a trustee named Laurence Levy (804-644-2000) was appointed the previous week by the court to mangle the assets of the company.

Mr. Segura could not help me with respect to what the types of wastes might be that remained on-site. He was not a technical person when employed by the company. I concluded my inspection at that point.

V. DOCUMENT REVIEW:

No documents were available for review. The company was shutdown and may never reopen. No one is monitoring the hazardous waste remaining on-site other than the removal bid of the 138 drums inside the building.

VI. ISSUES TO BE ADDRESSED:

The company is questionable for resuming operations. The main priority for this situation is to ensure the removal of the remaining hazardous waste. The presence of various releases must be addressed either through the sites program or the closure provisions of the RCRA regulations. The Agency should file as a creditor to access any monies that may be distributed in the event of a Chapter 7 liquidation. If no filing is made, we may be locked out of funds for evaluating the site.

Currently, the company trustee is pursuing a site assessment and cleanup of any potential contamination. Mr. Levy indicated that he wanted to be able to sell the property without any problems. Because of this action, the potential for liquidation seems a strong possibility.

2 53 gal/m drum

dimitryla fenced area near back

2 ^{uncovered} film containers zinc

1 film container under cyclone.

1 tank - opens full from stand pipe

zinc on ground

+ 138 drums in building

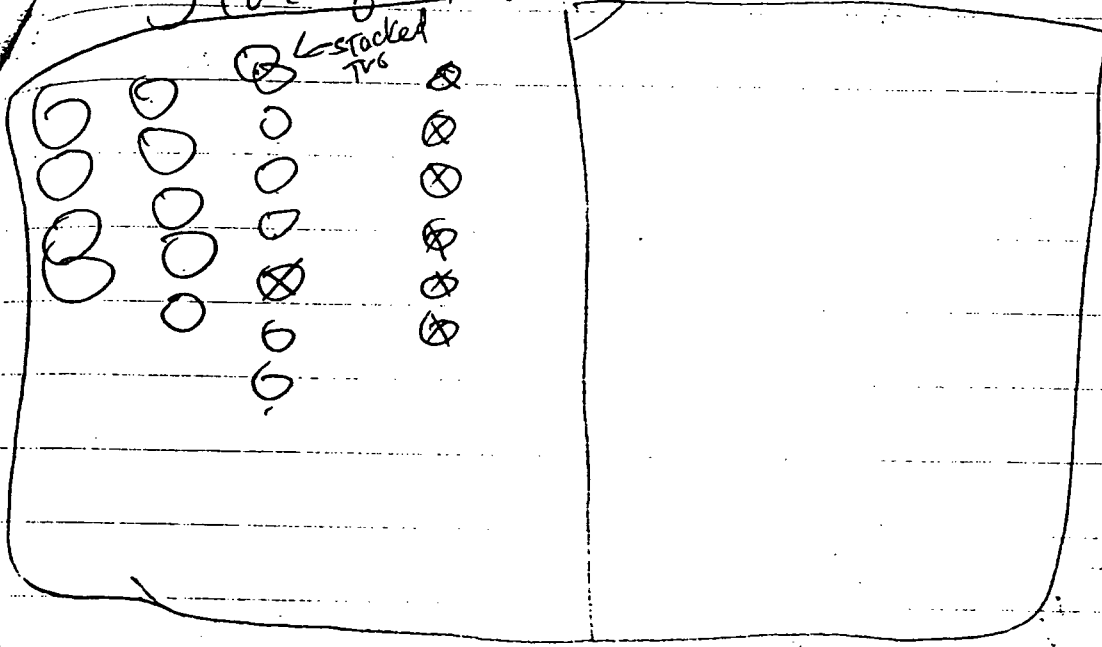
+ ~ 21 yd³ reject capacitors

Lawrence Levy - ~~Tracer~~
804-644-2000

Manny Segura -

9/24/89

Storage Diagram



7 Fiber drums <
15 55 gallon
1 ~30 gallon corrosive label

oil

methyl alcohol

Falrene

trichloroethylene

Hydrochloric acid

resins, of coating

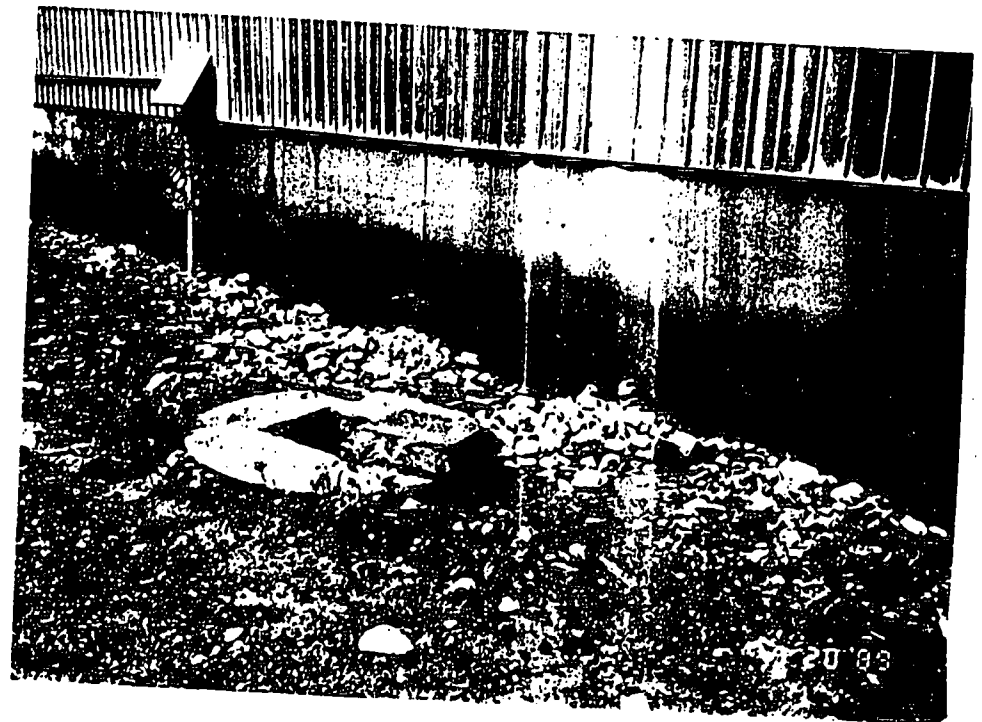
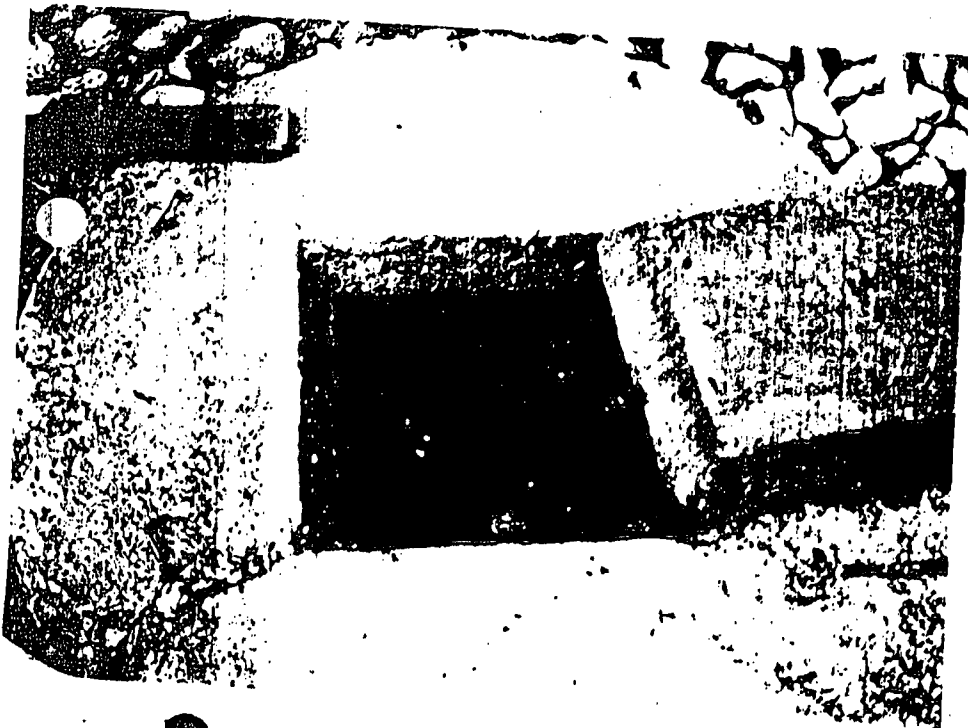
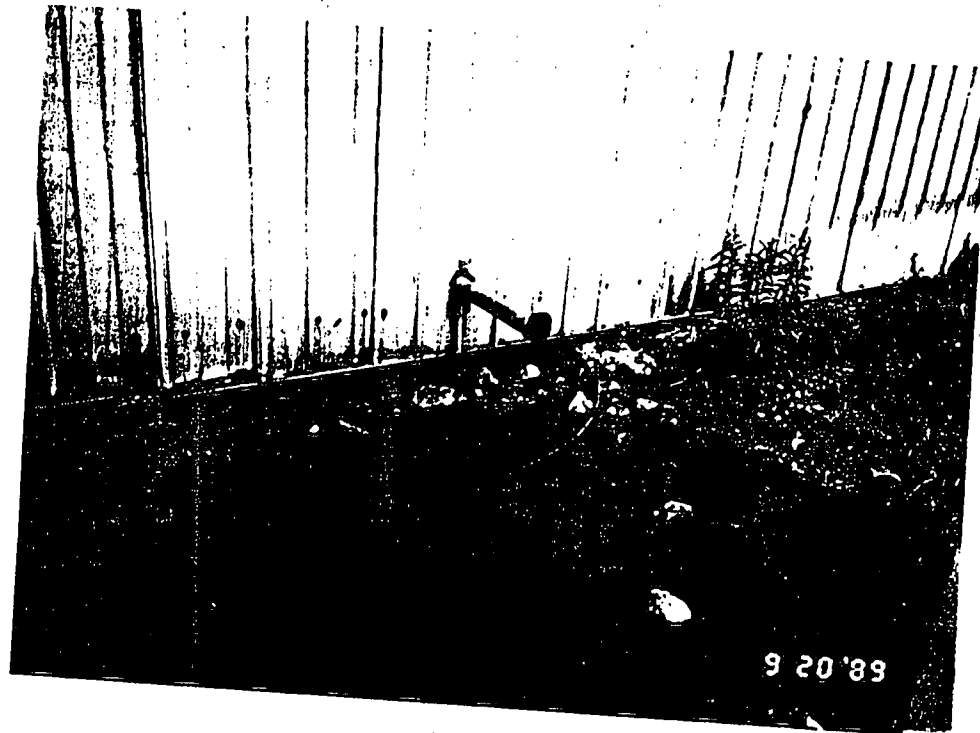
Paint Enamel

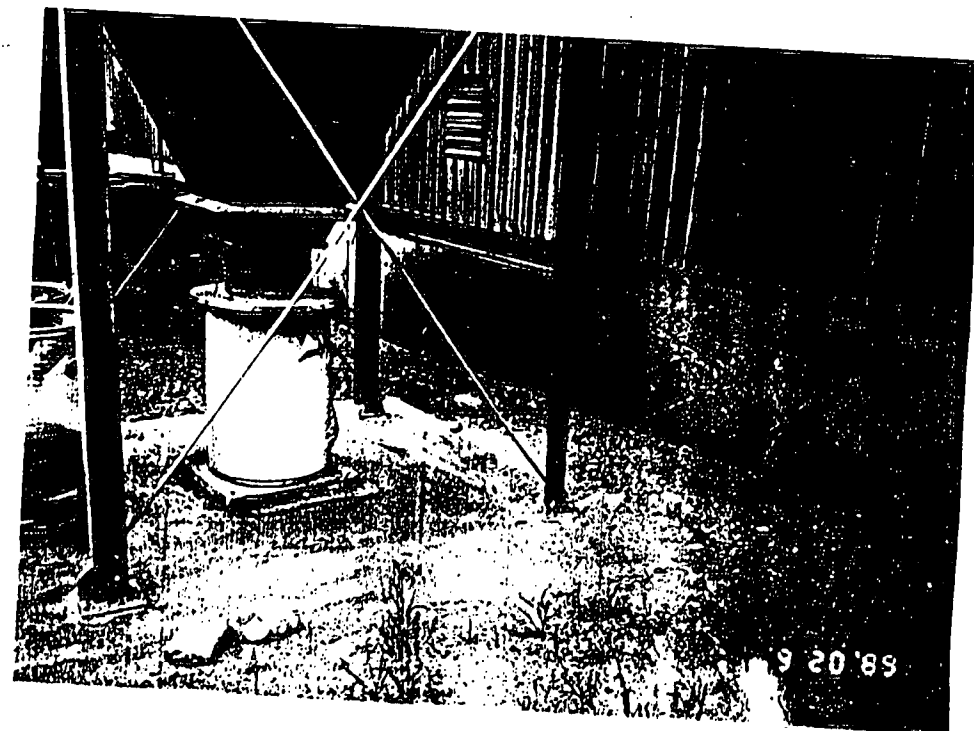
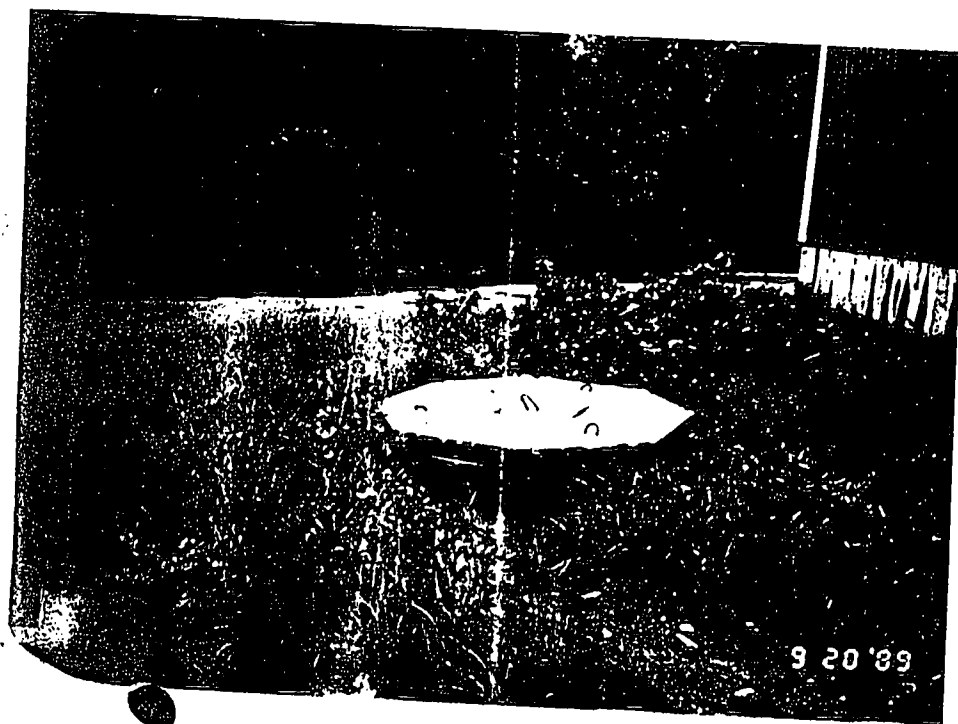
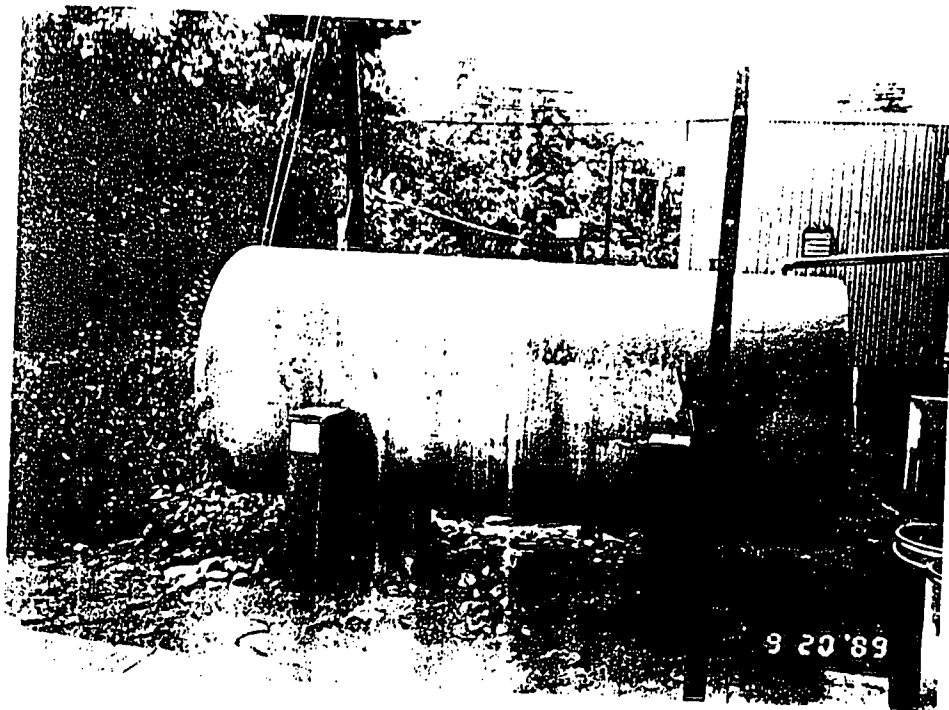
Methanol

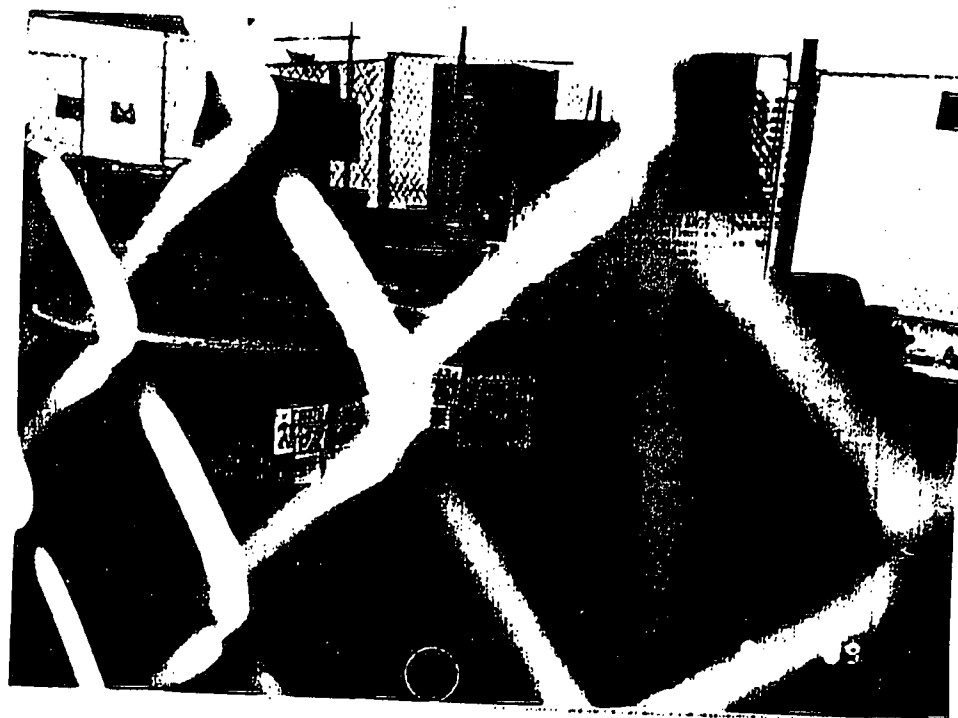
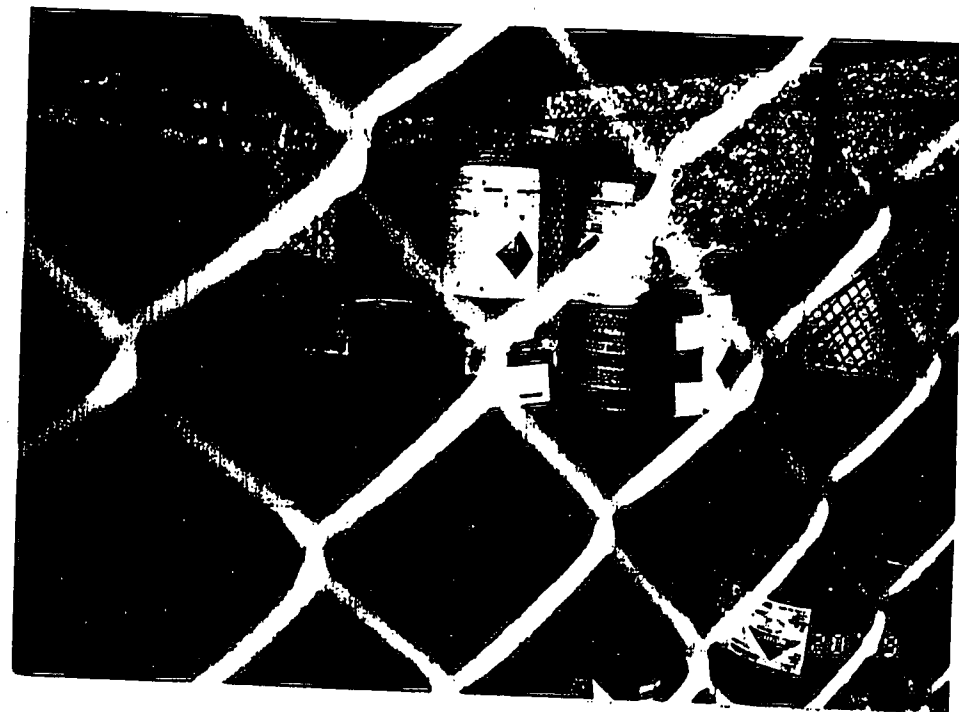
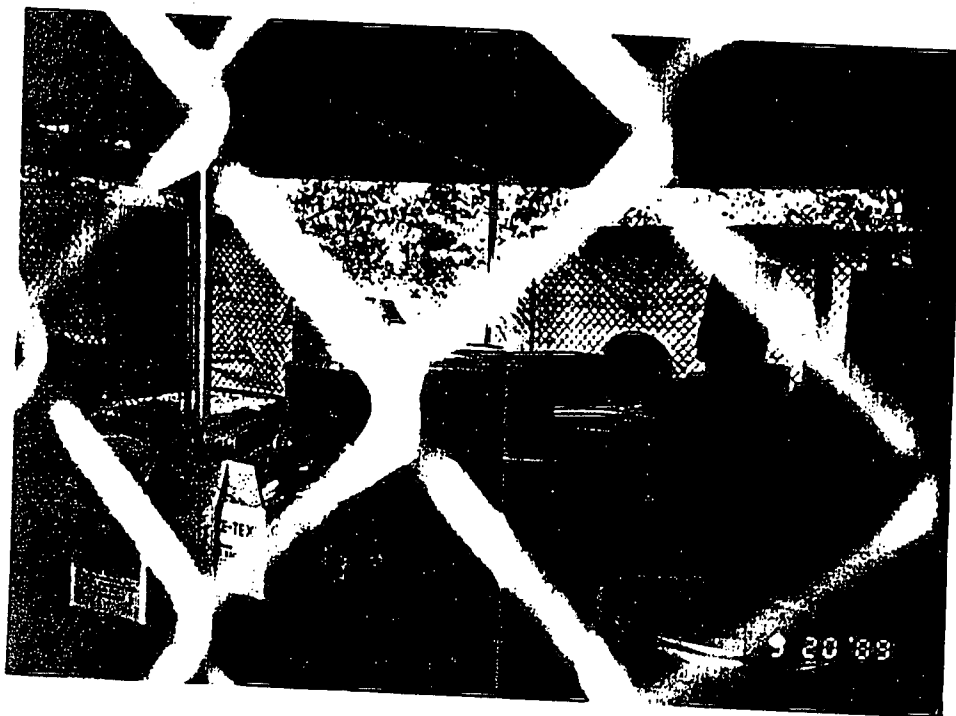
Pestane

Plastic solvent

~ 35 55 gallon steel
~ 30-40 5, 10 gal assorted other size







TRIP REPORT

Jard Company Inc.
P. O. Box 650
Bowen Road
Bennington, VT 05201

PARTICIPANTS:

Kenneth Rota, VT AEC
Charles Watson, Jard
Steve Fralick, Jard

DATE OF INSPECTION:

October 31, 1986

LAST INSPECTION:

October 25, 1982

PURPOSE OF INSPECTION:

Determine Compliance

EPA ID #:

VTD048141741

SOURCE CLASSIFICATION:

Generator

PROCESS DESCRIPTION:

Jard Company is a manufacturer of oil-filled capacitors and small control transformers. The company has been in operation since 1969 and employs 250 people for a total of three shifts.

The oil filled capacitors are wound, assembled, impregnated with oil, degreased, tested, and painted. The transformers are also wound first, assembled, varnished and tested.

The components manufactured have applications in heating, ventilation and air condition's (microwaves airconditioning and refrigerators are a few products that these components are used in.)

HAZARDOUS WASTE STREAMS:

1. Dioctylphalate (DOP) - capacitor impregnating fluid
2. Reject Motor Run Caps - filled with DOP
3. Varnish - used on transformers
4. Paint - painting of capacitors

5. Trichloroethane
6. Trichloroethylene
7. Methylene Chloride
8. Oil - soaked speedi dri
9. DOP waste water and phosphate cleaner

PROBLEM AREAS:

1. No Daily Inspections
2. No Inspection Log
3. No Written Inspection Schedule
4. Containment Recommended around 2000 Gallon Tank
5. No Communication Device in the Storage Area
6. No Written Training Plan
7. No Records of Employee Training
8. Storage of Drums greater than 90 days
9. Open Bung Cap on Drum

RECOMMENDED ACTION:

Issue a Notice of Violation

KBR/ch

Pre-inspection Interview

1. How long has facility been in operation? 1969
2. How many hours a day are they operating? 3 shifts
3. How many people are employed at the plant? 250
4. What is the manufacturing process?

OIL-FILLED CAPACITORS, small control transformer
Capacitors - WINDING - IMPREGNATION - DEGRASSING - TESTING - PAINT
TRANSFORMERS - WINDING - Assembly - VARNISH - Test

5. What are the raw materials used?

6. What are the wastes and quantities generated by the process?

DOP
OILS
PAINT & VARNISH
TCF TCA
Methylene Chloride
Waste motor run capacitors

7. What are the commercial uses of the products?

HVAC Applications (microwaves, AC, Refrigerators)

SITE INSPECTION CHECKLIST

I. GENERAL INFORMATION:

SOURCE NAME

JARD COMPANY Inc

MAILING ADDRESS

P.O. Box 650

STREET ADDRESS

Bower Rd
Bennington VT 05201

CONTACT PERSON NAME, ADDRESS, & TELEPHONE NUMBER

Charles Watson, 802-442-3173

NAME, ADDRESS, & TELEPHONE NUMBER OF CORPORATE HEADQUARTERS

Same

DATE OF INSPECTION

10/31/86

CONSULTANT(S) NAME, ADDRESS & TELEPHONE NUMBER

None

CERTIFIED WASTE HAULER'S NAME, ADDRESS & TELEPHONE NUMBER

CESCO

PERMITS OBTAINED

PURPOSE OF INSPECTION

Annual

EPA ID#

VTD 48141741

II. SOURCE CLASSIFICATION:

STATE/FEDERAL MAJOR (>1000 KG/MONTH)

FEDERAL NON-MAJOR

STATE GENERATOR (100-1000 KG/MONTH)

SMALL QUANTITY (<100 KG/MONTH)

LESS THAN 90 DAYS

GREATER THAN 90 DAYS

TRANSPORTER

TREATMENT, STORAGE & DISPOSAL
(TSD) FACILITY

CHECK

COMMENTS

III. TYPE OF STORAGE:

CONTAINERS

TANKS, ABOVE-GROUND

TANKS, BELOW-GROUND

SURFACE IMPOUNDMENTS

OTHER

IV. A) STORAGE AREA:

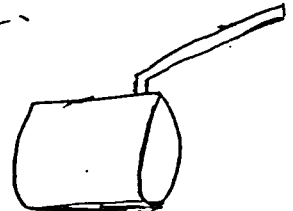
PROPERLY SECURED

DRUMS IN GOOD CONDITION

DRUMS LABELED

CARD BARRY GAYLORDS

	CHECK	COMMENTS
IV. A) STORAGE AREA (CONT'D)		
LABELS PROPERLY AND LEGIBLY COMPLETED	_____	
INVENTORY OF WASTE IN STORAGE	_____	
DATE OF LONGEST ACCUMULATION	<u>3/15/81</u>	
REQUIRED AISLE SPACE	_____	
DANGER SIGNS	_____	
NO SMOKING SIGNS (I,R)	_____	
AREA >50' FROM PROPERTY LINE (I,R)	_____	
SEPARATION OF INCOMPATIBLE WASTE	_____	
IMPERMEABLE CONTAINMENT SURFACE	_____	
10% CONTAINMENT AREA	_____	
 B) TANKS:		
2' FREEBOARD	_____	O.K.
10% CONTAINMENT	_____	
GOOD CONDITION	_____	
FLOW CONTROLS	_____	
STORAGE CONTROLS	_____	
LEVEL ALARMS	_____	
 V) INSPECTION		
DAILY INSPECTIONS	_____	
WRITTEN INSPECTION SCHEDULE	_____	
INSPECTION LOG	_____	No inspection sheets



No inspection sheets

VI) PREPAREDNESS AND PREVENTION

CHECK

COMMENTS

REQUIRED EQUIPMENT

INTERNAL COMMUNICATION

TELEPHONE OR TWO-WAY RADIO

FIRE EXTINGUISHERS

SPILL CONTROL MATERIAL/EQUIPMENT

ADEQUATE WATER SUPPLY

VII) CONTINGENCY PLAN

PLAN ON-SITE

PLAN SUBMITTED TO LOCAL POLICE,
FIRE, HOSPITAL & EMERGENCY RESPONSE

ARRANGEMENTS WITH LOCAL AUTHORITIES

STATEMENT OF EMERGENCY PROCEDURES

EMERGENCY COORDINATOR & ALTERNATES

EMERGENCY EQUIPMENT

EVACUATION PLAN

VIII) PERSONNEL TRAINING

SYLLABUS COVERING EMERGENCY
PROCEDURES EQUIPMENT & SYSTEM

**JOB TITLES RELATED TO HAZARDOUS
WASTE AND PERSON NAME FILLING
EACH JOB**

WRITTEN JOB DESCRIPTION

1-2-3-4-5

ARM
Telephone

① ✓ | ✓ | ✓ | ✓

Write in
Recom'dation
oil tank burner
mixture clean up
set of pot'l spill

Verbal Plan

N 8

ND

No

VIII) PERSONNEL TRAINING (CONT'D)

CHECK

COMMENTS

DATES OF TRAINING

RETENTION OF RECORDS FOR LIFE
OF FACILITY

ANNUAL REVIEW FOR ALL PERSONNEL

— No Records
— Has been
— verbal

IX) MANIFESTS

CORRECT PROCESSING

RECORDS OF PAST SHIPMENTS

ALL REQUIRED COPIES

✓
✓
✓

X) SUBSURFACE DISPOSAL

FLOOR DRAINS

DRYWELL

LEACHFIELD

SEPTIC TANK

municipal

—
X
—
—
—

washing machines

Submitted of 1/1
Resubmitted to
FSA / Cecos

Still waiting

5/15 — 10/30/86

— Steve Fralick —
Open Bung

JUL 6 1981

STATE OF VERMONT
AGENCY OF ENVIRONMENTAL CONSERVATION
HAZARDOUS WASTE MANAGEMENT PROGRAM

6N

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

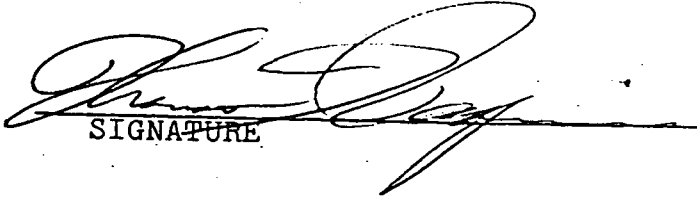
1. Name of generator or facility JARD Company, Incorporated
2. Mailing Address P.O. Box 650, Bowen Road
Bennington, Vermont 05201
3. Name of contact person and phone number where they can be reached: Thomas T. Paquin - 802/442-3173
4. Type of hazardous waste activity:
generation x treatment storage x
disposal
5. Brief description of the activities checked above: Capacitors not meeting specifications are rejected and stored in cardboard boxes until enough weight is accumulated for truckload shipment to CECOS for disposal. Waste flammable fluids are collected and stored in a 2000 gallon tank for accumulation and removal by Cyn Oil or New England Marine.
6. Description of each hazardous waste generated, treated, stored, or disposed of and the amount of each waste generated or handled in an one-month period:
- | <u>Description</u> | <u>Monthly volume or weight</u> |
|--------------------------|---------------------------------|
| <u>Reject Capacitors</u> | <u>20,000#</u> |
| <u>Waste Fluids</u> | <u>300 Gallons</u> |
7. Description of the method of treatment or disposal being used for each waste stream listed above (Please give the name of the facility treating or disposing of the waste if the waste is sent off-site).
- Reject Capacitors - Landfill, Cecos International, Inc.
- Waste Fluids - Reclaimed and blended with heavy fuel oils.- Cyn Oil or New England Marine

Notification of Hazardous Waste Activity

-2-

8. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I understand that all information contained in this notification will be made available to the public unless the Secretary certifies such information as proprietary upon request.



SIGNATURE

Thomas T. Paquin, Vice-President Operations
NAME AND TITLE

1 July 1981
DATE

MEMORANDUM

TO: John A. Malter *JAM*

FROM: Robert B. Nichols *RBN*

SUBJECT: Meeting With Jard Inc. on March 28, 1980

DATE: April 3, 1980

A routine industrial waste survey at Jard Inc. conducted in October 1979 by this office revealed an oily discharge from a vent pipe at the rear of the building. A soil sample was obtained and submitted to the State Health Department for analysis of PCB's. Positive results from that analysis suggested a backup analysis which was completed by Transformer Service Inc. on March 21, 1980. The TSI result indicated a level of 330 micrograms/gram of Aroclor 1016. The meeting on March 28th was called to discuss this result and determine the need for corrective action.

I met with Thomas Pacquin, Vice President for Operations, and we toured the plant. The discharge area for the oily vapors is behind the main building. An area of perhaps one hundred square feet has a dark oily stain. The discoloration is on the surface only and does not penetrate the soil greater than 2 or 3 inches.

The company proposes to cover the area with crushed gravel and maintains the opinion that excavation of the contaminated soil for disposal at a secure landfill is not justified. Eight secure landfills have been approved by EPA for disposal of PCB contaminated soil; of these, the CECOS facility in Niagara Falls and the SCA facility in Model City, New York, are the closest sites to Vermont. Alternatively, the company is receptive to covering the area with top soil and seeding or excavation of the soil and disposal at SCA. I concur with the company's proposal to leave the material in place, but covered, because the probability of adverse exposure to the public during excavation, transportation, and disposal at a secure landfill would be considerably greater than potential adverse impacts from leaving the soil in place covered.

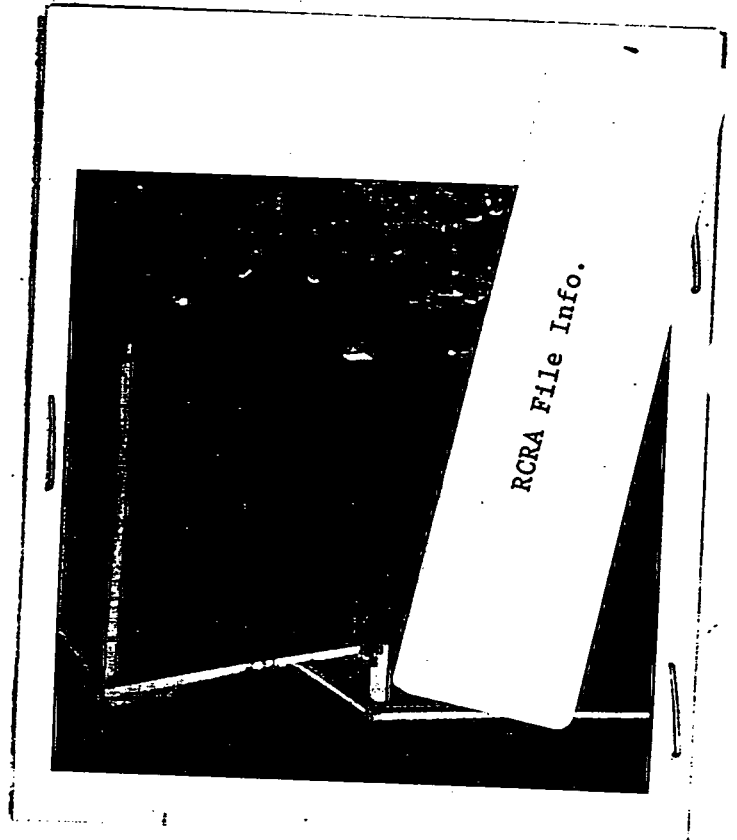
Recommendation:

I recommend that a soil containing not less than 30% clay be placed over the contaminated soil to a uniform thickness of 6 inches. Migration studies on PCB's in soils indicate movement potential drops off dramatically in clay soils. A final cover of either gravel or top soil seeded with grass seed is acceptable.

RBN:lah

Upper pipe was used to vent PCB
vapors from evacuation system.
Storage tank is to a recycling
cooling water tank

leads to evacuation system
to through liquid nitrogen to



Ally stain in this picture is
apparently from air conditioning
equipment receiver that drain
system

